ATTACHMENT 5

PERSONNEL TRAINING

PERSONNEL TRAINING [40 CFR 270.14(b)(12), 264.16; R315-8-2.7]

The Rapid Response System training program provides Rapid Response System personnel with the necessary knowledge and skills to perform hazardous waste duties safely, efficiently, and in an environmentally sound manner. The purpose of this training program is to prepare Rapid Response System crew members for Rapid Response System mission responsibilities, with emphasis on reducing potential risks that may threaten human health or the environment. This is accomplished by ensuring that Rapid Response System personnel handling hazardous waste can properly perform their assigned duties and responsibilities. In addition to providing training in the mechanics of the job functions, this training program provides Rapid Response System personnel with a thorough understanding of the Rapid Response System system operations, including the safety and emergency response operations. Refresher training will be conducted, as necessary, to update workers on new methods or equipment.

This training program meets the requirements of 40 Code of Federal Regulations (CFR) 264.16, 270.14, and R315-8-2.7 by:

- Providing specific training for various hazardous waste management positions;
- Ensuring that all operator personnel assigned to Rapid Response System duties: (1) complete the Rapid Response System training program prior to being assigned to duties that include operating Rapid Response System equipment if chemical agent identification sets (CAIS) or process wastes are present in the operations trailer, and (2) do not work unsupervised at an Rapid Response System site until the required training has been successfully completed;
- Ensuring that the Rapid Response System training program is directed by qualified persons trained in hazardous waste management procedures;
- Providing training that ensures that Rapid Response System personnel are able to respond effectively to emergencies;
- Maintaining required documentation at the Rapid Response System Administrative Office;
- Maintaining training records on current Rapid Response System personnel until closure of Rapid Response System operations at the site; and
- Maintaining training records on former Rapid Response System personnel for at least 3 years from the date last worked at the Rapid Response System test site.

Section 5-1 outlines the Rapid Response System training program. Section 5-2 describes how the

training program is implemented, and Section 5-3 describes how training records are maintained.

5-1 OUTLINE OF TRAINING PROGRAM [40 CFR 264.16(a)(1); R315-8-2.7(a)(1)]

The Rapid Response System Training Program has been designed to ensure that personnel will be able to perform their specific job assignment. The training program consists of classroom, hands-on, and on-the-job training, and will be implemented in accordance with the job-specific training requirements listed in Table 5-1, and the Rapid Response System Operations Qualification Program provided in Appendix 5-1. The Rapid Response System training program consists of the following four phases:

- *Operator Compliance Training Phase.* As part of the Operator Compliance Training Phase, all Rapid Response System personnel will receive, at a minimum, training in the following areas: cardiopulmonary resuscitation (CPR) and first aid, protection from blood borne pathogens, Toxic Aid Briefing [Hazard Communication (HAZCOM)], Hazardous Waste Operations and Emergency Response [HAZWOPER/24-hour Occupational Safety and Health Administration (OSHA) 1910.120], HM 181/126F Hazardous Materials Transportation, and Resource Conservation and Recovery Act (RCRA) Compliance. Additionally, personnel filling the positions of Site Supervisor and Site Safety and Health Officer (SSHO), and selected Glovebox Operators and Chemists will also receive HAZWOPER Supervisor training (OSHA 8-hour 1910.120). Furthermore, personnel filling the positions of Site Supervisor, Glovebox Operator, Monitoring Specialist, Raman Operator, SSHO, and Maintenance and Supply Officer (MSO) will also be trained in Laser Safety. Under normal circumstances, Operator Compliance Training will be completed before personnel start work at the site.

- *Operator Qualification Training Phase.* As part of the Operator Qualification Training Phase, the Rapid Response System personnel will be trained to perform specific functions associated with their designated job assignments. The job-specific training requirements are listed in Table 5-1. This training will be provided after the personnel have completed the Operator Compliance Training Phase. However, to allow for flexibility, some Rapid Response System personnel may be cross-trained to perform job functions that would normally be outside their designated job assignment, such that they may assume these other job functions, if necessary.

Table 5-1. RRS Job-Specific Training Requirements

Course Title	Job Description									
	Site Supervisor	Glovebox Operator	Monitoring Specialist	Raman Operator	SSHO	MSO	Site Administrator	DEC	Chemist	Laboratory Technician
Operator Compliance Training Phase										
CPR/First Aid[a]	X	X	X	X	X	X	X	X	X	X
Blood borne Pathogen[b]	X	X	X	X	X	X	X	X	X	X
Toxic Aid Briefing (HAZCOM)[b]	X	X	X	X	X	X	X	X	X	X
HAZWOPER (24-hour OSHA 1910.120)[c]	X	X	X	X	X	X	X	X	X	X
HAZWOPER Supervisor (8-hour OSHA 1910.120)	X	X[d]			X				X[d]	
HM 181/126F Hazardous Materials Transportation[e]	X	X	X	X	X	X	X	X	X	X
RCRA Compliance[b]	X	X	X	X	X	X	X	X	X	X
Laser Safety	X	X	X	X	X	X				
Operator Qualification Training Phase[f]										
Forklift Operation		X[d]								
Prime Mover O&M		X				X				
Trailer O&M		X				X				
HVAC System O&M		X				X				
Power Generation System O&M	X	X				X				
Glovebox Air Filtration System O&M	X	X								
Waste Containerization System O&M	X	X								
PIG Cutter O&M		X								

Course Title	Job Description									
	Site Supervisor	Glovebox Operator	Monitoring Specialist	Raman Operator	SSHO	MSO	Site Administrator	DEC	Chemist	Laboratory Technician
Neutralization Station Equipment O&M	X	X								
Chemical Materiel Monitoring System O&M (MINICAMS®, DAAMS, and Colorimetric Tubes)	X	X	X							
MINICAMS® O&M	X		X							
Meteorological Station O&M	X	X								
Intercom/Alarms O&M[g]	X	X	X	X	X	X	X	X	X	X
RRS Introduction	X	X	X	X	X	X	X	X	X	X
Description of CAIS	X	X	X	X	X	X	X	X	X	X
First Entry Monitoring	X	X	X							
RRS Setup	X	X	X	X		X				
Loading CAIS		X								
Unpacking CAIS		X								
Identifying, Segregating, and Storing CAIS	X	X		X						
Repackaging Industrial Chemicals	X	X								
Neutralizing Chemical Agents	X	X								
Handling Hazardous Waste Drums	X	X								
Non-routine Operations (Incidental Spills)[g]	X	X	X	X						
Unexpected Operations	X	X	X	X						
Emergency Operations[g]	X	X	X	X	X	X	X	X	X	X
Daily Shutdown	X	X	X	X						
Final Shutdown and Closeout	X	X	X	X		X				
Preparation for Movement of the RRS	X	X	X	X		X				

Course Title	Job Description									
	Site Supervisor	Glovebox Operator	Monitoring Specialist	Raman Operator	SSHO	MSO	Site Administrator	DEC	Chemist	Laboratory Technician
Team Training Phase										
Operations with SETH Items	X	X	X	X					X	X
Site-Specific Training Phase										
DCD Local Area Briefing	X	X	X	X	X	X	X	X	X	X
DCD Hazardous Waste Handling Procedures	X	X	X	X		X			X	X

Notes:

[a] Annual recertification required
[b] Annual refresher required
[c] Annual 8-hour refresher required
[d] Required for selected personnel only
[e] Triennial refresher required
[f] Annual Equipment and Procedural refresher required
[g] This course is part of Contingency Plan Training

CAIS = chemical agent identification set
CPR = cardiopulmonary resuscitation
DAAMS = Depot Area Air Monitoring System
DCD = Deseret Chemical Depot
DEC = Data Entry Clerk
HAZCOM = hazard communication
HAZWOPER = Hazardous Waste Operations
HVAC = heating, ventilation, and air conditioning
O&M = Operations and Maintenance
OSHA = Occupational Safety and Health Administration
RCRA = Resource Conservation and Recovery Act
RRS = Rapid Response System
SETH = simulated equipment test hardware
SSHO = Site Safety and Health Officer
MSO = Maintenance and Supply Officer

- *Team Training Phase.* As part of the Team Training Phase, the Rapid Response System crew, and any additional support personnel, will be trained as an integrated team, using CAIS simulated equipment test hardware (SETH) to simulate realistic mission scenarios. During this training, personnel will use the Rapid Response System equipment and will follow the Rapid Response System standing operating procedures in the same manner as if they were conducting toxic operations. At the end of the training, but before the start of toxic operations, a pre-operational survey will be conducted to evaluate the proficiency of the Rapid Response System personnel to perform the Rapid Response System operations, as a team. This training will be provided after the Rapid Response System personnel have completed both the Operator Compliance Training Phase and the Operator Qualification Training Phase.

- *Site-Specific Training Phase.* As part of the Site-Specific Training Phase, all Rapid Response System personnel will receive the Deseret Chemical Depot Local Area Briefing and selected personnel will be familiarized with the Deseret Chemical Depot Hazardous Waste Handling Procedures. This training addresses Deseret Chemical Depot-specific site activities, hazards, and emergency response requirements. All Rapid Response System personnel will attend this Site-Specific Training Phase before engaging in any hazardous waste operations. Additionally, prior to the daily startup of Rapid Response System activities, a prework briefing will be given to all Rapid Response System personnel to discuss the activities planned for the day.

As discussed in Appendix 5-1 and Section 5-1c, the Rapid Response System Training Director is responsible for coordinating all training.

Section 5-1a provides the job titles and job descriptions for the Rapid Response System personnel involved in hazardous waste operations. Section 5-1b describes the training content, frequency, and techniques. Section 5-1c describes the responsibilities and qualifications of the Rapid Response System Training Director, who will coordinate training of Rapid Response System personnel. Section 5-1d describes the relevance of the training to the job positions, and Section 5-1e describes training for emergency response.

5-1a Job Title/Job Description [40 CFR 264.16(d)(1) and (d)(2); R315-8-2.7(d)(1) and (d)(2)]

As shown in Table 5-1, personnel conducting Rapid Response System operations will be identified by the following job titles:

- Site Supervisor;
- Glovebox Operator;
- Monitoring Specialist;
- Raman Operator;
- Site Safety and Health Officer (SSHO);

- Maintenance and Supply Officer(MSO);
- Site Administrator;
- Data Entry Clerk (DEC);
- Chemist; and
- Laboratory Technician.

A detailed description of the responsibilities and the minimum qualification and training requirements associated with each job title is provided in Appendix 5-2. The name(s) of Rapid Response System personnel performing the responsibilities associated with each of these job titles will be maintained onsite at the Rapid Response System Operator Office.

5-1b Training Content, Frequency, and Techniques [40 CFR 264.16(c) and (d)(3); R315-8-2.7(c) and (d)(3)]

The training program for Rapid Response System personnel involved in hazardous waste management at Deseret Chemical Depot consists of a combination of classroom, hands-on, and on-the-job training, as outlined in Section 5-1, and will be implemented in accordance with the job-specific training requirements listed in Table 5-1, and the Rapid Response System Operations Qualification Program provided in Appendix 5-1. The training program includes job orientation, safety procedures, and basic work principles. This training program consists of four phases of training, as described in Section 5-1 and discussed in detail in the following paragraphs.

Operator Compliance Training Phase. At a minimum, all Rapid Response System Operator personnel involved in hazardous waste management operations have or will receive training in the following areas:

- CPR/First Aid;
- Blood borne Pathogen;
- Toxic Aid Briefing (HAZCOM);
- HAZWOPER/24-hour OSHA 1910.120;
- HM 181/126F Hazardous Materials Transportation; and
- RCRA Compliance.

Additionally, personnel filling the positions of Site Supervisor and SSHO, and selected Glovebox Operations and Chemists will also receive HAZWOPER Supervisor training (OSHA 8-hour 1910.120). Furthermore, personnel filling the positions of Site Supervisor, Glovebox Operator, Monitoring Specialist, Raman Operator, SSHO, and MSO will also be trained in Laser Safety.

Rapid Response System personnel will be qualified to meet the minimum training requirements outlined in OSHA standard 29 CFR 1910.120 covering HAZWOPER for operations conducted under RCRA. Qualification records for Rapid Response System personnel will be maintained by the Rapid Response System Operator onsite. This training will include:

- 24 hours of initial training consisting of classroom and hands-on experience in the use of personal protective equipment (PPE), safe operating practices, identification of potential hazards or hazardous situations, etc., in accordance with the OSHA standards;
- 8 hours of annual refresher training in addition to the 24-hour HAZWOPER training for all Rapid Response System personnel;
- 8 hours of specialized supervisory training for Rapid Response System personnel serving as supervisory staff; and
- Work activity for new Rapid Response System personnel under the supervision of a trained and experienced supervisor.

Operator Qualification Training Phase. All Rapid Response System personnel have or will receive detailed job knowledge through classroom instruction, practical exercises, and on-the-job training. The Operator Qualification Training Phase is outlined in Section 5-1. Rapid Response System instruction will include classes to teach equipment characteristics, operating instructions, and maintenance procedures; and classes to teach correct operating procedures when using the equipment. The description of the equipment training required is presented in Table 5-2. The description of the process-related training required is presented in Table 5-3. These tables also show the approximate hours of classroom lecture/discussion and hands-on practical exercises, and the organization that presents the training. These tables lay out the minimum structured basic training for Operator Qualification Training Phase.

As part of the Operator Qualification Training Phase, specialized training will be required for the Monitoring Specialist. This training will consist of the following classroom instruction, hands-on, and on-the-job training:

- As part of the MINICAMS® operator qualification process, a 1-week operations and optional 1-week maintenance training course provided by the MINICAMS® manufacturer will be required. This training will include the theory of gas chromatography, the applications of that theory to the MINICAMS®, and the structure and operating principles of the system, including the system software, general monitoring capabilities, safety practices, operator level maintenance, and troubleshooting. Hands-on practical training will be used extensively.

Table 5-2. Instruction Addressing Operation of Equipment

Equipment Item	Trainer	Approximate Hours	Description of Training
Forklift	RRS System Operator	4 to 6	Discussion of features and safety. Practical exercises in setup, operation, and maintenance.
Prime Mover, Trailers, and HVAC	RRS System Operator	12 to 14	Discussion of features and safety. Maintenance and setup practical exercises.
Power Generation System	RRS System Operator	8 to 10	Discussion of features and safety. Practical exercises in startup, shutdown, changeover, and maintenance.
Glovebox Air Filtration System	RRS System Operator	4 to 6	Discussion of features and safety. Practical exercises in setup, startup, shutdown, and performance of maintenance on the glovebox air filtration system.
Waste Containerization System	RRS System Operator	12 to 14	Discussion of features and safety. Practical exercises in setup, startup, shutdown, and performance of maintenance on the waste containerization system.
PIG Cutter	RRS System Operator	8 to 10	Discussion of features and safety. Practical exercises in identification of unpack station equipment and setup, startup, shutdown, and performing maintenance on the PIG cutter.
Raman Spectrophotometer	RRS System Operator	40 to 80	Discussion of features, safety, and equipment operation and maintenance. Practical exercises in segregating CAIS items.
Neutralization Station Equipment	RRS System Operator	4 to 6	Discussion of features and safety. Practical exercise in setup and maintenance.
Chemical Materiel Monitoring Equipment	RRS System Operator	4 to 6	Discussion of features and safety. Description of monitoring system to include MINICAMS®, DAAMS, and colorimetric tubes. Operation and maintenance of DAAMS and colorimetric tubes. Maintenance and setup practical exercises.
MINICAMS®	RRS System Operator	40 to 80	Discussion of features, safety, and equipment operation and maintenance. Practical exercises in challenging and calibrating equipment.

Equipment Item	Trainer	Approximate Hours	Description of Training
Meteorological Station	RRS System Operator	2 to 4	Discussion of features and safety. Setup, operation, and maintenance exercises.
Intercom/Alarms	RRS System Operator	5 to 7	Discussion of features and safety. Practical exercises in setup and operation.

Notes:

CAIS	=	Chemical Agent Identification Set
DAAMS	=	Depot Area Air Monitoring System
HVAC	=	heating, ventilation, and air conditioning
RRS	=	Rapid Response System
RRS System Operator	=	Contractor retained to operate the RRS Subpart X unit

Table 5-3. Instruction Addressing RRS Operating Procedures

Operation	Trainer	Approximate Hours	Description of Training
RRS Introduction	RRS System Operator	3 to 5	Discussion of RRS system, mission, operational concepts, and crew requirements.
Description of CAIS	RRS System Operator	3 to 5	Description of use of CAIS items and discussion of procedures and safety measures.
First Entry Monitoring	RRS System Operator	3 to 5	Discussion of procedures and forms. Discussion of requirements and safety measures.[a]
RRS Setup	RRS System Operator	8 to 10	Discussion of procedures and safety measures. Setup and startup for RRS operations.
Loading CAIS	RRS System Operator	4 to 6	Discussion of procedures and safety measures. Safe and efficient loading of CAIS into the operations trailer.
Unpacking CAIS	RRS System Operator	14 to 16	Discussion of procedures and safety measures. Unpacking practical exercises.
Identifying, Segregating, and Storing CAIS	RRS System Operator	4 to 8	Discussion of procedures and safety measures. Identification practical exercises.
Repackaging Industrial Chemicals	RRS System Operator	6 to 8	Discussion of procedures and safety measures. Repackaging practical exercises.
Neutralizing Chemical Agents	RRS System Operator	16 to 18	Discussion of procedures and safety measures. Neutralization practical exercises.

Handling Hazardous Waste Drums	RRS System Operator	12 to 14	Discussion of procedures and safety measures. Practical exercises on performing sample collection of swipes and obtaining solid/liquid drum samples,[a] and on drum loading, unloading, and storage.

Operation	Trainer	Approximate Hours	Description of Training
Non-Routine Operations	RRS System Operator	8 to 10	Discussion of procedures and safety measures. Non-routine operations practical exercises.
Unexpected Operations	RRS System Operator	2 to 4	Discussion of procedures and safety measures.[a]
Emergency Operations	RRS System Operator	4 to 8	Discussion of procedures and safety measures.[a]
Daily Shutdown	RRS System Operator	2 to 4	Discussion of procedures and safety measures. Daily shutdown practical exercises.
Final Shutdown and Closeout	RRS System Operator	4 to 6	Discussion of procedures and safety measures. Sampling for closure practical exercises.
Preparation for Movement	RRS System Operator	8 to 10	Discussion of procedures and safety measures. Prepare RRS system movement.

Notes:

[a] Practical exercises on these subjects are integrated into the other operations practical exercises.

CAIS = Chemical Agent Identification Set
RRS = Rapid Response System

- Upon completion of this training, the operators will take a written test and demonstrate their understanding of MINICAMS® operation. The instructor will verify that the operators have successfully passed the written test and demonstrated the proper operation of all the MINICAMS® equipment to be used in support of Rapid Response System operations. Operators who do not pass the final exam will not be permitted to operate the Rapid Response System monitoring equipment until additional training has been received and the exam passed.

- Personnel performing air monitoring with the Depot Area Air Monitoring System (DAAMS) sample station equipment will require training on the proper setup, operation, collection, and shutdown of all DAAMS sample station equipment. The training will cover the selection of the proper DAAMS samples tubes, visual inspection of the DAAMS tubes, and operation of the mass flowmeter, rotameter, needle values, and vacuum pump. Proper operation and programming of the sequencer will be included when applicable. The training will also include storage of the DAAMS sample tubes prior to use, proper sample collection for sample integrity, leak-checking of the sample collection station, placement of the sample station for air monitoring, disposal of DAAMS tube, and preventive maintenance and troubleshooting of the mass flowmeter, vacuum pump, and DAAMS sample station.

  Upon completion of training, the personnel will take a written test. The instructor will validate that the trainees have successfully passed the written test and demonstrated the proper operation of all of the DAAMS sample station equipment to be used in support of Rapid Response System operations.

- Personnel performing air monitoring with colorimetric tubes will require training on the proper setup, operation, collection, and disposal of all colorimetric tube samples. The training will cover selection of the colorimetric tubes, operation of pumps, storage of the colorimetric tubes prior to use, leak-checking of the system, proper placement of the tube for sample collection, proper interpretation of the length of stain results, and proper disposal of the used sample tube. The operator training will also include performing preventive maintenance and troubleshooting pumps.

  Upon completion of training, the operators will take a written test. The instructor will verify that the operators have successfully passed the written test and demonstrated the proper operation of all of the colorimetric equipment to be used in support of Rapid Response System operations. Operators who do not pass the final exam will not be permitted to use colorimetric tubes in the Rapid Response System until they have been retrained and passed the test.

Team Training Phase. After completing individual equipment and procedural training required as part of the Operator Qualification Program, team training is conducted to exercise Rapid Response System personnel on the proper operating techniques and procedures for Rapid Response System operations. Routine, non-routine, and emergency operations, as well as operations in various levels of PPE, are covered. Training is conducted using SETH — simulated K941 and K951 CAIS — to verify equipment training and validate the Operations and Maintenance Manual and the operational procedures developed for processing the CAIS materiel at Deseret Chemical Depot. The Rapid Response System System Operator Training Director is responsible for this training and is assisted

by Tooele Army Depot Ammunition Equipment Directorate and contractors.

The team training will proceed until the Rapid Response System supervisor is satisfied that the crew is ready to conduct toxic operations with CAIS items. The Rapid Response System team will then be evaluated during a preoperational survey to be conducted by Program Manager for Chemical Demilitarization (PMCD). This survey will examine the Rapid Response System training program as well as operator refresher training in emergency response procedures, first aid, security procedures, and general reporting requirements.

Site-Specific Training Phase. Deseret Chemical Depot requires site-specific training to be conducted prior to entrance into certain areas of the installation. This training includes the Deseret Chemical Depot Local Area Briefing and familiarization with the Deseret Chemical Depot hazardous waste handling procedures. All Rapid Response System personnel working at Deseret Chemical Depot are required to attend this training, or will receive equivalent instructions approved by Deseret Chemical Depot. Documentation of this training will be in accordance with Deseret Chemical Depot policies.

Prior to the daily startup of Rapid Response System activities, a prework briefing will be presented by the Site Supervisor and the SSHO to all Rapid Response System personnel. The following topics may be addressed:

- Names of personnel and alternates responsible for site health and safety;
- Safety, health, and other hazards present on the site as documented in the site-specific health and safety plan, and additional hazards, if any, found during the site activities;
- Use of site-specific PPE;
- Work practices that will minimize risks from hazards and exposure;
- Safe use of engineering controls and equipment that are present on the site;
- Physical and chemical health hazards, including recognition of symptoms and signs that may indicate overexposure to such hazards;
- Emergency response/contingency plans, including notification process and routes of escape;
- Importance of the buddy-system;
- Any other site-specific features as deemed necessary by the SSHO; and
- Inspection of all power equipment at the start of each day.

5-1c Rapid Response System Training Director [40 CFR 264.16(a)(2); R315-8-2.7(a)(2)]

The Training Director is responsible for the training of Rapid Response System personnel. The Training Director must be knowledgeable in all aspects of operation of the Rapid Response System. The responsibilities of the Training Director are to:

- Coordinate training of Rapid Response System personnel in the proper operation of the Rapid Response System in accordance with Federal, State, Army, and installation regulations;

- Coordinate continuing training, as necessary, to inform Rapid Response System personnel of new procedures, provide refresher training, and provide training for new personnel;

- Ensure that training records are maintained in accordance with 40 CFR 264.16(d) and (e) and R315-8.2-7(d) and (e); and
- Ensure that Rapid Response System personnel are trained in hazardous waste management and contingency plan implementation, including emergency procedures, and ensure that Rapid Response System personnel receive training appropriate to their positions.

The Rapid Response System Operator Training Director is appointed by the Rapid Response System Operator Project Manager and must be qualified in hazardous waste management in accordance with 40 CFR 264.16(a)(2) and R315-8-2.7(a)(2).

5-1d Relevance of Training to Job Position [40 CFR 264.16(a)(2); R315-8-2.7(a)(2)]

As shown in Table 5-1, individual training profiles have been prepared by the Rapid Response System Training Director for each Rapid Response System position that requires a formal training program. Each profile serves as a guide for identifying the minimum requirements associated with achieving and maintaining required proficiency for the specific job. Proficiency is developed through the Operator Compliance and Qualification training phases, and experience gained during the Team Training Phase.

5-1e Training For Emergency Response [40 CFR 264.16(a)(3); R315-8-2.7(a)(3)]

Emergency response training will be provided to all Rapid Response System personnel. This training is provided by the Rapid Response System Operator for operator qualification. Rapid Response System-specific Emergency Response Training will be provided by Rapid Response System training cadre. At a minimum, the training program will be designed to ensure that all Rapid Response System personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems, including:

- Procedures for using, inspecting, repairing, and replacing Rapid Response System emergency and monitoring equipment.
- Communications and alarm systems.
- Implementation of the contingency plan and appropriate emergency notifications.
- Shutdown operations. Shutting down equipment in use after ensuring that all CAIS items are in overpacks or in intact containers (no leaks). Any spilled material will be cleaned up and disposed of in one of the waste drums.
- Emergency operations. Rapid Response System Operators will be trained to identify, contain, and mitigate the effects of an emergency condition. Activation of the chemical materiel monitoring alarms in the work space and failure of mechanical equipment resulting in serious injury are examples of emergency incidents. Training in response to fires and explosions will be provided.
- Non-routine operations. If a spill of liquid chemical agent or an industrial chemical is detected in the Rapid Response System glovebox system or if a leak is suspected, non-routine operational procedures will be implemented.

Certain operations under specific non-routine and emergency conditions will be examined to assess Rapid Response System Operator training and performance of prescribed procedures. Non-routine conditions will include the simulated breakage of CAIS ampules or bottles within the glovebox

system while under engineering controls. Emergency conditions will include a simulated serious injury or illness of a crew member, or fire in the Rapid Response System work space.

5-2 IMPLEMENTATION OF TRAINING PROGRAM [40 CFR 264.16(b); R315-8-2.7(b)]

Personnel will receive training in accordance with the Operator Compliance Training Phase prior to their assignment to the Rapid Response System. Crew members will then enter the Qualification Training Phase. This training is facilitated by the Rapid Response System Operator Training Director. After successfully completing this training program, operator and additional Rapid Response System personnel will participate in the Team Training Phase. Upon arrival at Deseret Chemical Depot, all personnel will also receive training specific to Rapid Response System operations at Deseret Chemical Depot.

Training will be evaluated during a preoperational survey to be conducted by PMCD and Deseret Chemical Depot. This survey will examine the Rapid Response System training program including operator training in emergency response procedures, first aid, security procedures, and general training requirements.

All Rapid Response System personnel will be required to complete an Rapid Response System training program specific to his/her job assignment and will not work unsupervised until training has been successfully completed. Furthermore, operator personnel must complete the requisite operator training prior to engaging in any hazardous waste operations.

5-3 TRAINING RECORDS [40 CFR 264.16(d) and (e); R315-8-2.7(d) and (e)]

Training records for Rapid Response System personnel will be maintained at the Rapid Response System Administration Office onsite, and will include, at a minimum:

- Job title for each position related to hazardous waste management operation and activities, and the name of each employee filling the position;
- Job description specifying duties for each position, minimum qualifications required to fill the position, and required training for the position;
- Description of the type and amount of introductory and continuing training that will be given to each employee;
- Date each employee started working in the Rapid Response System; and
- Course enrollment, attendance, and successful completion information.

All training records and documentation on current Rapid Response System personnel will be kept until closure of the Rapid Response System. Training records on former Rapid Response System personnel will be kept for at least 3 years from the date last worked at the Rapid Response System test site.